

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DEBRA O'MARA

Plaintiff

v.

POLICE OFFICER  
THOMAS LICIARDELLO (BADGE No. 4383)  
Individually and as a Police Officer  
for the City of Philadelphia;

POLICE OFFICER  
JOHN SPEISER (BADGE No. 7169)  
Individually and as a Police Officer  
for the City of Philadelphia;

POLICE OFFICER  
BRIAN REYNOLDS (BADGE No. 4268)  
Individually and as a Police Officer  
for the City of Philadelphia;

SERGEANT  
JOSEPH McCLOSKEY (BADGE No. 331)  
Individually and as a Police Officer  
for the City of Philadelphia;

POLICE OFFICER  
PERRY BETTS (BADGE No. 6761)  
Individually and as a Police Officer  
for the City of Philadelphia;

POLICE OFFICER  
LESLIE SIMMONS (BADGE No. 4561)  
Individually and as a Police Officer  
for the City of Philadelphia

POLICE OFFICER  
NATHAN LONDON (BADGE No. 6760)  
Individually and as a Police Officer  
for the City of Philadelphia

CIVIL ACTION  
No. #13-

JURY TRIAL DEMANDED

**POLICE OFFICER  
RICKMAN WILLIAMS-JACKSON  
(BADGE No. 2612)  
Individually and as a Police Officer  
for the City of Philadelphia**

**POLICE OFFICER  
GREGORY BARBER (BADGE No. 2559)  
Individually and as a Police Officer  
for the City of Philadelphia**

**POLICE OFFICER  
JAMES O'NEILL (BADGE No. 5786)  
Individually and as a Police Officer  
for the City of Philadelphia**

**POLICE OFFICER  
KEVIN GORMAN (BADGE No. 3778)  
Individually and as a Police Officer  
for the City of Philadelphia**

**POLICE OFFICER JOHN DOES 1-25  
(BADGE Nos. Presently Unknown)  
Individually and as Police Officers  
for the City of Philadelphia;**

**POLICE OFFICER JANE DOES 1-25  
(BADGE Nos. Presently Unknown)  
Individually and as Police Officers  
for the City of Philadelphia;**

**and**

**CITY OF PHILADELPHIA**

**Defendants**

## **COMPLAINT**

## **JURISDICTION**

1. Plaintiff brings this action pursuant to 42 United States Code Section 1983.

Jurisdiction is based upon 28 United States Code Sections 1331 and 1343 (a) (1),

(3), and (4). Plaintiff further invokes supplemental jurisdiction under 28 United States Code Section 1367 (a) to hear and decide claims under state law.

### **PARTIES**

2. Plaintiff Debra O'Mara is an adult female who was at all relevant times a resident of Philadelphia, Pennsylvania.
3. Defendant City of Philadelphia is a Municipality of the Commonwealth of Pennsylvania that owns, operates, manages, directs, and controls the City of Philadelphia Police Department, which employed Defendant Police Officers at all times relevant to this action.
4. Those Defendant Police Officers who are named in the instant complaint were at all times relevant to this action Officers of the City of Philadelphia Police Department. Most, if not all, of these Defendants were members of the Narcotics Strike Force or other units purportedly dealing with the investigation of illegal narcotics. Each is being sued in his/her individual capacity and as a Police Officer for the City of Philadelphia. During the course of the incidents described herein, these Defendant Officers were acting under color of state law.
5. Upon information and belief, Defendant Police Officers John Doe 1-25 and Jane Doe 1-25 were at all times relevant to this action Officers of the City of Philadelphia Police Department, most of whom were members of the Narcotics Strike Force or other units dealing with the purported investigation of illegal narcotics and whose identities are presently unknown but are expected to be determined with reasonable certainty during discovery. Each is being sued in